Application No. 10/042,000   Attorney's Docket No. 0119-119
Response to 02/10/2005 Action

REMARKS

Claims 1-37 are pending.

The Action objects to FIGs. 1-3 because they do not include a legend such as --Prior Art--. Accompanying this Amendment are three Replacement Sheets of drawings showing that legend added to those Figures. The Examiner's acceptance of the Replacement Sheets is respectfully requested.

The Action rejects claims 1-8, 22, and 27-30 under 35 U.S.C. § 102(e) for anticipation by U.S. Patent No. 6,691,173 to Morris et al. ("Morris") and claims 9-21, 23-26, and 31-37 under 35 U.S.C. § 103(a) for obviousness over a combination of Morris and J. Kardach, "Bluetooth Architecture Overview", XP-002141146, 1998 ("Kardach").

For reasons described in more detail below, the anticipation rejections should be reconsidered and withdrawn because Morris does not teach all of features recited in the claims rejected for anticipation. In addition, the obviousness rejections should be reconsidered and withdrawn at least because the combination of Morris and Kardach fails to teach or even suggest all of the features recited in the subject claims as required for a *prima facie* case of obviousness.

Pending claim 1, for example, defines a method for coordinating network nodes in a network. In pertinent part, the method includes informing a first slave node of a first period to scan for inquiry messages and informing a second slave node of a second period for scanning for inquiry messages, where the first and second periods do not occur during a same period of time. This sort of assignment of periods for scanning is included in claims 1-8 and 22-30 and is described in the application at p. 11, ll. 11-19, and p. 12, l. 25 - p. 13, l. 10, for example.

Morris is utterly silent on informing slave nodes of periods for scanning for inquiry messages. The lengthy sections of Morris listed in the Action simply say nothing about these features of pending claims 1-8, 22, and 27-30, and so it is respectfully submitted that Morris fails to anticipate these claims. Accordingly, it is respectfully requested that the anticipation rejections be reconsidered and withdrawn.

As noted above, periods for scanning are also features of claims 23-26 through those claims' dependence on claim 22. Claims 23-26 stand rejected for obviousness

2

Application No. 10/042,000   Attorney's Docket No. 0119-119
Response to 02/10/2005 Action

over the combination of Morris and Kardach, but as just pointed out, Morris does not disclose informing slave nodes of periods for scanning for inquiry messages. Because the Action tacitly admits that Kardach also does not disclose these features, the combination of Morris and Kardach fails as a *prima facie* basis for the obviousness rejections at least because the combination does not disclose all of the features claimed. It is also believed the combination fails as a *prima facie* basis because of lacks of motivation to combine and expectation of success, but it is unnecessary to discuss these failures in detail in view of the preceding comments.

With further regard to claims 23-26 and to claims 9-21 and 31-37 that also stand rejected for obviousness over the combination of Morris and Kardach, claim 9, for example, defines a method for coordinating establishment of a connection between network nodes in a network. In pertinent part, the method includes sending an inquiry message from a first node to a second node, and sending an inquiry response message from the second node to the first node, where the inquiry response message includes page scan information which indicates parameters related to a scanning for page messages by the second node. Including such page scan information in the inquiry response message yields the significant benefit of efficient network operation. This sort of operation is described in the application at p. 14, l. 1 et seq., for example.

Morris and Kardach do not teach such inquiry messages and inquiry response messages that include page scan information. On page 5, the Action admits the absence of such features in Morris, but points to Kardach as disclosing "master node paging a slave node", and leaps from there to the subject matter claimed. But all that Kardach discloses is paging, which conventionally does not require any of the page scan information in an inquiry response message as claimed because in the normal network, the paging (master) node does not need to receive such information in an inquiry response message.

Thus, neither Morris nor Kardach discloses all of the features of the claims rejected for obviousness, and thus Morris and Kardach do not satisfy all three requirements for a *prima facie* case of obviousness: (1) disclosure of all of the claimed features, (2) disclosure of a motivation to combine the cited documents as suggested by

3

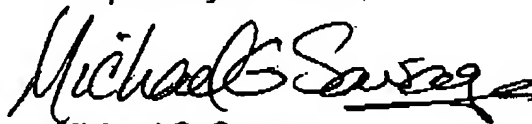Application No. 10/042,000   Attorney's Docket No. 0119-119
Response to 02/10/2005 Action

the Action, and (3) reasonable expectation of a successful modification and combination
of such complex documents to yield working methods and devices as claimed.
Accordingly, it is respectfully requested that the obviousness rejections be reconsidered
and withdrawn.

It is respectively submitted that all of the claims are allowable, and approval of
the accompanying three sheets of replacement drawings and an early Notice of
Allowance are earnestly solicited. If the Examiner has any questions, the undersigned
attorney may be telephoned at the number given below.

The Office will note that a Power of Attorney to Prosecute Applications and a
Change of Correspondence Address were filed on March 11, 2005.

Respectfully submitted,

Filed June 10, 2005

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4